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FEDERAL COMMUNICATIONS COMMISSION  
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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Number Portability Query Services ) CC Docket No. 98-14  
 )  
Pacific Bell Tariff F.C.C. No. 128, ) CCB/CPD 98-23  
Transmittal No. 1927 and 1973 )  
 )  
Southwestern Bell Tariff F.C.C. No. 73, ) CCB/CPD 98-17  
Transmittal No. 2638 and 2694 )  
 )  
Ameritech Tariff F.C.C. No. 2 ) CCB/CPD 98-26  
Transmittal Nos. 1123,1130 )  
 )  
Bell Atlantic Tariff F.C.C. No. 1 ) CCB/CPD 98-25  
Transmittal No. 1041 )

**REBUTTAL OF SOUTHWESTERN BELL TELEPHONE COMPANY  
AND PACIFIC BELL**

SOUTHWESTERN BELL TELEPHONE COMPANY  
PACIFIC BELL

ROBERT M. LYNCH  
DURWARD D. DUPRE  
HOPE E. THURROTT

One Bell Plaza, Room 3023  
Dallas, Texas 75202  
214-464-3620

Its Attorneys

July 17, 1998

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## SUMMARY

In their Rebuttal, Southwestern Bell Telephone Company and Pacific Bell (referenced collectively as "SBC") refute the allegations raised by various parties opposing their query services tariffs and Direct Case. SBC has demonstrated that its new charges are "just and reasonable" in compliance with Section 204 (a)(1) of the Communications Act. Further, it has complied with the requirements of the Order Designating Issues for Investigation in its production of additional evidence in support of its tariffs.

As SBC has been made clear in its Direct Case and this Rebuttal, the provisioning of query services is taking place in a competitive environment. Not only are alternate query service providers actively marketing their offerings, but many carriers intend to furnish this service internally and to their corporate affiliates. Under these circumstances, the investigation of query costs beyond that which would be appropriate for any other new service offering by a common carrier is unwarranted.

While the Commission's Third Report and Order in Docket No. 95-116 currently does not envision the inclusion of a general overhead factor, SBC believes that overhead expenses of the nature included in its tariff filings is consistent with prior Commission precedent. Fully allocated costs, inclusive of a general overhead factor, represent an attempt to recover the total cost of a service.

The record in support of SBC's tariffs appropriately details SBC's OSS and SS7 costs, its nonrecurring costs and its tandem and database query costs. SBC's proposed

allocation of total number portability costs based on anticipated query demand is reasonable and fully supported by the evidence produced. Moreover, the assessment of query charges in cases where the NXX is available for porting is consistent with the Commissions' dictates in the Third Report and Order.

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**REBUTTAL OF SOUTHWESTERN BELL TELEPHONE COMPANY  
AND PACIFIC BELL**

Southwestern Bell Telephone Company and Pacific Bell (collectively referenced as "SBC") file this Rebuttal in support of their tariffs and Consolidated Direct Case<sup>1</sup> and in response to Oppositions submitted by AT&T Corp (AT&T), Comcast Cellular Communications, Inc. ("Comcast"), Sprint Spectrum L.P. ("Sprint"), Nextel Communications, Inc. ("Nextel"), MediaOne Group, Inc. ("MediaOne"), Time Warner Communications Holdings Inc. ("Time Warner") and AirTouch Communications, Inc.

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<sup>1</sup> Consolidated Response of Southwestern Bell Telephone Company and Pacific Bell to Order Designating Issues for Investigation, filed July 1, 1998, in this proceeding ("Direct Case").

("AirTouch").<sup>2</sup> Contrary to the assertions of these parties, SBC through its tariff filings and its Direct Case has met its burden of proof in establishing that its new charges are "just and reasonable".

**I. SBC HAS MET ITS BURDEN OF PROOF BY DEMONSTRATING THAT ITS CHARGES ARE "JUST AND REASONABLE" AS REQUIRED BY SECTION 204 OF THE COMMUNICATIONS ACT.**

Certain of the parties filing oppositions to SBC's Direct Case and tariffs broadly attack what they would have the Bureau believe to be a lack of detail and support for the costs included in SBC's filings.<sup>3</sup> The evidence presented by SBC clearly refutes these spurious claims. As was delineated in the Order Designating Issues for Investigation<sup>4</sup>, in order to meet its burden, SBC was required to identify each cost proposed to be recovered, explain why the cost was directly attributable to the provision of its number portability query service and explain the methodology by which any joint or common cost has been allocated. This SBC has done. It has also explained its assumptions, methodologies and specific costs in accordance with acceptable practices. It further has identified and discussed all investments included in the direct costs. In doing so, SBC has provided the detailed data needed for the Bureau to make a reasoned determination as to whether the rates proposed are "just and reasonable." SBC has no doubt that the

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<sup>2</sup> Many of the arguments made by the opposing parties were previously advanced with regard to the earlier tariff filings of BellAtlantic and Ameritech. For this reason, SBC as part of this Rebuttal incorporates its "Southwestern Bell Telephone Company and Pacific Bell Rebuttal" filed *In the Matter of Number Portability Query Services*, CC Docket No. 98-14 on February 27, 1998.

<sup>3</sup> AirTouch pp. 6-8; Sprint, pp. 2-3; AT&T, pp. 3-7.

<sup>4</sup> Order Designating Issues for Investigation, *In the Matter of Number Portability Query Services*, CC Docket No. 98-14, released June 17, 1998.

Bureau will properly recognize the self-serving approach of these opposing parties in assessing the record which has been presented.

## **II. NUMBER PORTABILITY QUERY SERVICES ARE BEING PROVIDED IN A COMPETITIVE ENVIRONMENT.**

Several opposing parties contend that SBC's representation that additional providers are offering competitive querying services is false.<sup>5</sup> Yet, it is unlikely that these very carriers have not been approached by other query services providers. If not, they are in the minority; certainly, SBC's own affiliates have been solicited. For example, to date, one of SBC's wireless companies has received proposals for the handling of number portability queries from MCI and Illuminet.<sup>6</sup> Indeed, AirTouch's basic complaint is less that there are no other providers of this service but that such alternate providers are "influenced" by the charges of the ILECs.<sup>7</sup> Despite the claims of AirTouch and MediaOne, there are actually competitive query providers targeting wireless companies.<sup>8</sup> A good example of these providers is Stratus Computer which in its February 23, 1998 announcement stated its intent to offer wireless carriers an "innovative 'triggerless' approach to number portability to quickly address the first phase of the FCC number portability mandates due December 1998 and avoid potential costly tariffs imposed by

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<sup>5</sup> MediaOne, p. 4; AirTouch pp. 2-3; AT&T, pp. 9-12; Sprint, p. 2-3.

<sup>6</sup> Information concerning Illuminet's offering is readily accessible on its web site, [www.illuminetss7.com](http://www.illuminetss7.com).

<sup>7</sup> AirTouch, p. 3, footnote 11.

<sup>8</sup> Indeed, MediaOne's contention that SBC assumes it will perform 100% of queries incorrectly takes this statement out of context. Rather Appendix B, II of SBC's Direct Case states SBC's assumption that 60 % of wireless carriers' LNP queries will involve the use its database.



incumbent and competitive local exchange carriers."<sup>9</sup> In addition, many carriers<sup>10</sup> intend to provide querying services internally and to their affiliates. Other carriers, including the CLECs and wireless carriers, are not dependent upon, and are not depending upon, the ILECs to be the sole providers of querying services as represented in the opposing parties filings.

As SBC explained in its Direct Case<sup>11</sup>, it is only one of the providers of querying services to carriers. If its charges exceed competitive market prices, the procurers of the service will simply purchase them from another provider. Under these circumstances, the investigation of query costs beyond that which would be appropriate for any other new service offering by a common carrier is unwarranted.

### **III. SBC HAS DEMONSTRATED THAT ITS QUERY CHARGES ARE DIRECTLY RELATED TO THE COSTS OF PROVIDING QUERY SERVICES.**

#### **A. THE INCLUSION OF GENERAL OVERHEAD COSTS IS CONSISTENT WITH PRIOR COMMISSION PRECEDENT AND APPROPRIATE IN THIS CONTEXT.**

SBC is not unmindful, as the opposing parties are quick to argue<sup>12</sup>, that the Commission's Cost Recovery Order, issued after the filing by SBC of its tariffs,

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<sup>9</sup> See, Stratus Computers' announcement at its web site, [www.stratus.comm/news/98all/](http://www.stratus.comm/news/98all/).

<sup>10</sup> It is curious that AT&T's wireless company would chose to obtain query services from a different provider than its own affiliate, however, the fact that it can make this choice is further evidence that this is a competitive offering. See, AT&T, p.19, footnote 34.

<sup>11</sup> Direct Case, p. 3.

<sup>12</sup> AirTouch, pp. 6,14; Sprint, pp. 3-4; AT&T, pp. 9-12; Time Warner, pp. 4-8.

does not envision the inclusion of general overhead costs.<sup>13</sup> Yet, as SBC explained in its Direct Case, overhead expenses of the nature included in its tariff filings have been allowed in previous FCC proceedings.<sup>14</sup> The use of a general overhead loading factor applied to the incremental costs of the number portability query service, effectively creates a fully allocated cost study. It does not permit "double recovery" as the Commission mistakenly concluded in the Cost Recovery Order.<sup>15</sup> Rather, this fully allocated cost, inclusive of the general overhead factor, represents an attempt to recover the total cost of the service. Certainly, SBC has provided sufficient data in its Direct Case as to the validity of the calculation of this expense.

Since this is a competitive service, market forces will discipline the price. The Commission should recognize that incremental costs are not appropriate for setting prices, but are relevant to a firm in making market entry and exit decisions and to a regulator for discovering potentially anticompetitive pricing strategies. If the firm is forced to price its services to only recover the incremental costs of each of its services, shared costs and overheads will never be recovered, total costs will exceed total revenues and the firm will fail. Moreover, this is an inefficient form of pricing that sends incorrect market signals and could thwart competition. For

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<sup>13</sup> Third Report and Order, *In the Matter of Telephone Number Portability*, CC Docket No. 95-116, released May 12, 1998 ("Cost Recovery Order").

<sup>14</sup> Direct Case, pp. 4-9.

<sup>15</sup> Cost Recovery Order, para. 74. SBC shall seek the Commission's reconsideration of this point and has no doubt that the Commission, once provided a full and complete record, shall concur with SBC's position.

these reasons, SBC continues to assert the appropriateness of its inclusion of the specified overhead expenses.

**B. SBC'S PROPOSED ALLOCATION OF TOTAL NUMBER PORTABILITY COSTS IS REASONABLE BASED ON ANTICIPATED QUERY DEMAND.**

The rates for the SPNP Query Prearranged and SPNP Query Default and the SPNP Query Databases Charges filed by SBC were computed using a methodology that includes a recovery of 15% of SBC's projected costs of implementing LNP. The remainder of the implementation costs shall be allocated to the Basic SPNP Service Charge. This treatment is consistent with the guidelines specified in the Cost Recovery Order.<sup>16</sup>

As fully explained in SBC's Direct Case, this allocation is based upon expected query volume. None of the opposing parties identify a more appropriate basis for cost allocation. However, while not directly contesting the use of demand for determining this allocation, several of the opposing parties state that such a method represents merely a "best guess" and its calculation has not been adequately explained.<sup>17</sup> Yet, as AirTouch acknowledges "the incumbent LECs should be given some discretion in forecasting their initial demand for a new

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<sup>16</sup> Cost Recovery Order, para. 135-149.

<sup>17</sup> AirTouch, pp. 19-22; Sprint, pp. 5-7; AT&T, pp. 16-17.

service...".<sup>18</sup> Moreover, as Sprint recognizes,

... the most accurate reflections of demand for LNP traffic is available from the incumbent LECs' switches. Their switches record every CDR passed through from another carrier and bill according to this information.<sup>19</sup>

It is this information, as described in SBC's Direct Case, which has served as the basis for its demand forecast. Indeed, it is ironic that the opposing parties would attack the validity of these forecasts while also adamantly opposing the provisioning of the traffic information requested by Ameritech.<sup>20</sup> The "Catch-22" position favored by these opposing parties would be to deny the projections of the BOCs as to traffic demand while refusing in turn to produce the information by which these forecasts can be either confirmed or refuted. Clearly, the Commission should reject such gamesmanship and accept the demand forecast advanced by SBC based on best available information.

SBC would also note that AT&T's contention that SBC's "overstated" demand assumptions has lead SBC to inflate its cost figures<sup>21</sup> is without merit. In fact, since the cost per query was determined by dividing the total cost by the total forecasted queries for five years, an "overstated" demand would act to reduce the cost per query, not increase it. In addition, AT&T's "assumption" that SBC has

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<sup>18</sup> AirTouch, p. 20.

<sup>19</sup> Sprint, p. 7.

<sup>20</sup> AirTouch, pp. 27-29; MediaOne, pp. 5-6; Sprint, pp. 5-7; A&T, pp. 16-17.

<sup>21</sup> AT&T, p. 18.

included intraoffice calls in its demand estimates is incorrect.<sup>22</sup> Intraoffice calls were not included in SBC's forecast for the simple reason that queries are not performed on such calls.

Moreover, an annual "true-up"<sup>23</sup> process, such as that suggested by Sprint is unwarranted. A true-up process is inconsistent with the Commission's price-cap rules for new services, and should not be implemented with regard to this service.

C. IN ACCORDANCE WITH THE COST RECOVERY ORDER, QUERY CHARGES SHOULD BE ASSESSED IN CASES WHERE THE NXX IS AVAILABLE FOR PORTING.

AT&T and certain other opposing parties continue to assert that query charges should not be assessed unless a call terminates to an NPA NXX from which at least one number has been ported.<sup>24</sup> Indeed, AT&T glibly dismisses the Commission's determination that query charges are appropriate where the switch is available for porting as a "passing reference".<sup>25</sup>

Yet, to characterize the Commission's conclusion in such a fashion is disingenuous. The Cost Recovery Order speaks for itself. The Commission in paragraph 15 states, "Once number portability is *available* for an NXX, carriers *must* 'query' all interswitch calls to that NXX to determine whether the

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<sup>22</sup> AT&T, p. 18.

<sup>23</sup> Sprint, p. 8.

<sup>24</sup> AT&T, pp. 23-27; AirTouch, pp. 24-25; Nextel, p. 6; Sprint, pp. 10-11; Time Warner, pp. 2, 8-9.

<sup>25</sup> AT&T, p. 24.

terminating customer has ported the telephone number." In addition, in paragraph 46, the Commission reiterates its view stating, "In addition, long-term number portability requires N-1 carriers to incur query costs for all interswitch calls to an NXX once number portability is *available* for that NXX, whether or not the terminating customer has ported a number." SBC is at a loss as to how much clearer the Commission needs to be to make its directive understandable to the opposing carriers.

Although SBC believes the Commission's position on this point is clear, SBC at great length in its Direct Case has explained why charging for queries when LNP is available is appropriate.<sup>26</sup> The best uniformly applicable definition for "availability " in this context is that point in time that an NPA-NXX is designated as available for portability in the LERG. Once that is done, any CLEC, pursuant to the NANC process, may require an ILEC to port the first number within that NXX within five days and all subsequent numbers within three days.<sup>27</sup> The CLECs have required that all NXXs within selected switches be made portable and that all new NXXs added to selected switches within an MSA be made portable. At a minimum, queries must begin five days in advance of the first port. How therefore, can the opposing parties claim it is not reasonable to bill for queries until the first number in an NXX has been ported? The true issue

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<sup>26</sup> Direct Case, pp. 20-28.

<sup>27</sup> As SBC explains in its Direct Case, five days is not adequate to perform the processes required to activate querying in multiple switches. Direct Case, p. 22.

is one of timing; at what point prior to the first porting can an ILEC bill for queries?

Cost recovery is based on the principle of competitive neutrality. SBC will have expended the monies to make a switch available for porting, but it has no control over when a CLEC will require the first number to be ported.

**D. ONLY TYPE I AND TYPE II COSTS ARE INCLUDED IN SBC'S TARIFFS AND SUCH ARE DELINEATED IN ITS DIRECT CASE.**

AirTouch claims that "none of the BOCs have set forth all their costs and divided these costs into the three categories the Commission specified."<sup>28</sup> This statement misrepresents the record. SBC included only Type I and Type II costs in its analysis of SPNP query costs. Type III costs were not included since SBC is not seeking cost recovery from SPNP for these expenses. The Type I costs included were for each company's portion of the NPAC administration expenses for their respective regions. For Southwestern Bell Telephone Company, this information can be found on Figure 4 of Transmittal No. 2694 in the amount of \$30,320,000.00. For Pacific Bell, this figure, was in the amount of \$19,657,000.00.<sup>29</sup> All other expenses included in the cost analysis are considered to be Type II.

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<sup>28</sup> AirTouch, pp. 7-8.

<sup>29</sup> Unlike Southwestern Bell, Pacific Bell did not itemize its NPAC cost.

E. SUFFICIENT INFORMATION HAS BEEN PROVIDED IN SUPPORT OF THE INCLUSION OF OSS AND SS7 COSTS.

AT&T and AirTouch take the position that SBC has failed to provide sufficient information concerning its includable SS7 costs.<sup>30</sup> Again, the opposing parties are incorrect. SBC provided a detailed description of the methodology it used to develop its SS7 costs in its Direct Case.<sup>31</sup> The Southwestern Bell Telephone Company investment per query which resulted using this methodology is to be found on Figures 1 and 3 of Southwestern Bell's Transmittal No. 2694 and Pacific Bell's Transmittal No. 1973. This investment per query reflects the incremental SS7 costs incurred for SPNP Prearranged, Default and Database queries.

With regard to OSS investments, AT&T is correct that not all systems directly support the query.<sup>32</sup> The dollar amount could be significantly higher than that generated by the 15% cost allocation factor if SBC were to include, on a nonallocated basis, those systems, such as LSMS, RSMS, NetPilot and SOA, that directly support the query database. The 15% figure is utilized as a general allocator of LNP expenses, inclusive of all OSS/LNP expenses. In developing the OSS Type II costs, only those enhancements which were directly attributable to LNP were included in the cost model.

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<sup>30</sup> AT&T, p. 15; AirTouch, p. 13.

<sup>31</sup> Direct Case, p. 16.

<sup>32</sup> AT&T, p. 13.



F. NONRECURRING COSTS HAVE BEEN APPROPRIATELY DETAILED.

AirTouch and AT&T assert that SBC's assessment of nonrecurring billing charges for default queries is improper.<sup>33</sup> What these opposing parties ignore is the fact that such charges would only "reoccur" through the fault of the N-1 carrier if the N-1 carrier continually fails to properly anticipate its demand and prearrange for its query service. While an account for the carrier may exist, the attachment of these unforeseeable default query charges to the standard bill involves a labor intensive process, performed on a case-by-case basis.

AT&T claims that SBC's analysis is flawed since it fails to specify the times allotted to each of the tasks it asserts result in a billing charge or the actual labor rates it used to derive those charges.<sup>34</sup> As AT&T is well aware, the information it would have included in this public record is proprietary information, since labor rates are developed using confidential financial and personnel related data. The labor rates used by SBC in the SPNP study are the same rates used by its companies in all of their cost studies and the methodologies for developing these costs have been approved by their state commissions.

G. THE TANDEM AND DATABASE QUERY COSTS ARE REASONABLE AND SUPPORTED BY THE RECORD.

AirTouch alone raises issues related to SBC's tandem and database query costs. It claims that to assess the same charge for tandem and end office queries is

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<sup>33</sup> AirTouch, pp. 18-19; AT&T, pp. 20-21.

<sup>34</sup> AT&T, p. 20.

unreasonable.<sup>35</sup> It further claims that the BOCs "avoid substantial costs" with database only queries.<sup>36</sup> Again, AirTouch's contentions lack merit.

SBC charges the same rate for end office and tandem queries because the difference in cost between the end office and tandem query is de minimus. The only switch related investment included in the query rate is the cost to launch the query from the end office or tandem. The minuscule difference in the investment would have absolutely no impact on the final query rates.<sup>37</sup> This issue was discussed at length with Bureau representatives at an ex parte meeting held on May 8, 1997, and confirmed by a letter dated May 9, 1997, which included detailed exhibits, sent by Linc Brown, Director-Federal Regulatory, to William F. Canton, Acting Secretary of the Commission.

#### **IV. CONCLUSION**

SBC has demonstrated that its Query Tariffs have fully met the standards prescribed under Section 204(a)(1) of the Communications Act. For this reason, the

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<sup>35</sup> AirTouch, p. 16.

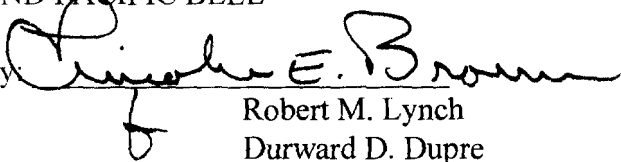
<sup>36</sup> AirTouch, p. 17.

<sup>37</sup> This fact is further illustrated by Ameritech's decision to modify the approach taken in its previous filing in which these charges were separate to now combining the two into a single charge.

Bureau should conclude its investigation on the basis of the record before it and determine that the rates, terms and conditions presented by these tariffs are just and reasonable.

Respectfully Submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY  
AND PACIFIC BELL

By  Robert M. Lynch  
Durward D. Dupre  
Hope Thurrott

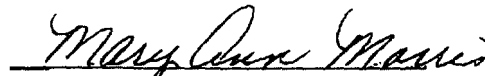
One Bell Plaza, Room 3023  
Dallas, Texas 75202  
214-464-3620

Attorneys for Southwestern Bell Telephone Company,  
and Pacific Bell.

July 17, 1998

**Certificate of Service**

I, Mary Ann Morris, hereby certify that the foregoing, "Rebuttal of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell," in CC Docket No. 98-14 have been served on July 20, 1998, to the Parties of Record.

  
Mary Ann Morris

July 20, 1998

ATTORNEYS FOR AT&T CORPORATION  
MARK C ROSENBLUM  
ROY E HOFFINGER  
JAMES H BOLIN, JR  
ROOM 324H3  
295 NORTH MAPLE AVENUE  
BASKING RIDGE NJ 07920

LORETTA J GARCIA  
DONALD J ELARDO  
MCI TELECOMMUNICATIONS CORP  
1801 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20006

MS MAGALIE ROMAN SALAS  
SECRETARY  
FCC  
1919 M STREET NW  
ROOM 222  
WASHINGTON DC 20554

ITS  
1919 M STREET NW  
ROOM 246  
WASHINGTON DC 20554

SANDRA K WILLIAMS  
PO BOX 11315  
KANSAS CITY MISSOURI 64112

JAMES SCHLICHTING  
CHIEF, COMPETITIVE PRICING DIVISION  
FCC  
1919 M STREET NW ROOM 518(1600C)  
WASHINGTON DC 20554

RICHARD METZGER JR  
CHIEF, COMMON CARRIER BUREAU FCC  
1919 M STREET NW ROOM 500  
WASHINGTON DC 20554

JAMES LICHFORD  
COMPETITIVE PRICING DIVISION FCC  
1919 M STREET NW ROOM 518  
WASHINGTON DC 20554

JUDITH NITSCHÉ  
CHIEF, TARIFF & PRICING ANALYSIS FCC  
1919 M STREET NW ROOM 518  
WASHINGTON DC 20554

JOEL ADER  
RAMONA STEWART  
BELL COMMUNICATIONS RESEARCH  
2101 L STREET NW FLOOR 6  
WASHINGTON DC 20037

PUBLIC REFERENCE ROOM  
TARIFF DIVISION FCC  
1919 M STREET NW ROOM 513  
WASHINGTON DC 20554

LARRY A PECK  
COUNSEL FOR AMERITECH  
2000 WEST AMERITECH CENTER DRIVE  
ROOM 4H86  
HOFFMAN ESTATES IL 60196-1025

JOHN M GOODMAN  
ATTORNEY FOR BELL ATLANTIC  
1300 I STREET NW  
WASHINGTON DC 20005

DANIEL GONZALEZ  
DIRECTOR REGULATORY AFFAIRS  
NEXTLINK  
1730 RHODE ISLAND AVENUE NW SUITE 1000  
WASHINGTON DC 20036

JAY KEITHLEY  
1850 M STREET NW  
11TH FLOOR  
WASHINGTON DC 20036

GERALDINE MATISE  
CHIEF, NETWORK SERVICES DIVISION  
FCC  
COMMON CARRIER BUREAU  
2000 M STREET NW ROOM 235  
WASHINGTON DC 20554

GLENN B MANISHIN  
CHRISTY KUNIN  
BLUMENFELD & COHEN  
1615 M STREET NW SUITE 700  
WASHINGTON DC 20036

ALVIN MCCLOUD  
FCC COMMON CARRIER BUREAU  
2000 M STREET NW SUITE 235  
WASHINGTON DC 20554

MARIAN GORDON  
NETWORK SERVICES DIVISION  
FCC COMMON CARRIER BUREAU  
2000 M STREET NW  
ROOM 235  
WASHINGTON DC 20554

WENDY BLUEMLING  
DIRECTOR REGULATORY AFFAIRS & PUBLIC  
POLICY  
SNET  
227 CHURCH STREET  
NEW HAVEN CT 06510

RICHARD MCKENNA HQE03J36  
GTE SERVICE CORPORATION  
PO BOX 152092  
IRVING TX 75015-2092

GAIL L POLIVY  
GTE SERVICE CORPORATION  
1850 M STREET NW  
SUITE 1200  
WASHINGTON DC 20036

ROBERT SUTHERLAND  
THEODORE KINGSLEY  
BELLSOUTH CORPORATION  
1155 PEACHTREE STREET NE  
ATLANTA GA 30309-3610

TERESA MARRERO  
SENIOR REGULATORY COUNSEL-FEDERAL  
TELEPORT COMMUNICATIONS GROUP  
TWO TELEPORT DRIVE  
SUITE 300  
STATEN ISLAND NY 10311

FREDRIK CEDERQUIST  
MANAGER-GOVERNMENT AFFAIRS  
TELEPORT COMMUNICATIONS GROUP  
TWO TELEPORT DRIVE  
SUITE 300  
STATEN ISLAND NY 10311

JAMES T HANNON  
1020 19TH STREET NW SUITE 700  
WASHINGTON DC 20036

JOSEPH R ASSENZO  
ELIZABETH H MCJIMSEY  
SPRINT SPECTRUM LP  
12TH FLOOR  
4900 MAIN STREET  
KANSAS CITY MO 64112

MICHAEL K POWELL  
FCC  
1919 M STREET NW, ROOM 844  
WASHINGTON DC 20554

SUSAN P NESS  
FCC  
1919 M STREET NW ROOM 832  
WASHINGTON DC 20554

YVONNE HAWKINS  
FCC  
1919 M STREET NW, ROOM 518  
WASHINGTON DC 20554

MARIE BRESLIN  
DIRECTOR GOVERNMENT RELATIONS FCC  
1300 I STREET NW SUITE 400 WEST  
WASHINGTON DC 20005

ANDRE J LACHANCE  
GTE SERVICE CORPORATION  
1850 M STREET NW SUITE 1200  
WASHINGTON DC 20036

RIO VIRGIN TELEPHONE COMPANY  
PO BOX 189  
ESTACADA OREGON 97023

PATRICIA L RAPUCH  
REGULATORY ANALYST  
CINCINNATI BELL  
201 E FOURTH STREET  
PO BOX 2301  
CINCINNATI OHIO 45201-2901

EUGENE J BALDRATE  
VP REGULATORY AFFAIRS  
CINCINNATI BELL  
201 E FOURTH STREET 102-910  
PO BOX 2301  
CINCINNATI OHIO 45201-2301